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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Local Exchange Carriers' Rates,	)	CC Docket No. 94-97, Phase II
Terms, and Conditions for	)	
Expanded Interconnection Through	)	
Virtual Collocation for Special	)	
Access and Switched Transport	)	

COMMENTS ON DIRECT CASE

Submitted by

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COMMENTS ON DIRECT CASE

INTRODUCTION

Electric Lightwave, Inc. (ELI) hereby submits its comments on the Direct Case filed by U S WEST Communications, Inc. (USWC) in CC Docket No. 94-97 Phase II. ELI is a competitive telecommunications provider operating in Arizona, California, Oregon, Utah, and Washington.

ELI believes there are certain fundamental principles that should be applied in determining whether the virtual collocation tariffs filed by the incumbent local exchange carriers will achieve the Commission's stated goal of fostering increased competition in the interstate access market. First, the virtual collocation tariffs should provide the interconnector (IC) the greatest amount of flexibility possible in controlling its own costs, including the costs associated with installation, maintenance, and repair of the interconnector's designated equipment (IDE). Second, the interconnector should be able to reasonably predict the total costs associated with virtual collocation services. Third, the interconnector should be able to control, to the greatest extent possible, the level of service quality associated with virtual collocation. The incumbent local exchange carriers' (LECs) virtual collocation tariffs must adhere to these three principles if virtual collocation is to foster increased competition in interstate access markets. Only through a competitive market will the Commission achieve the desired results that increased competition can bring. Those results include: greater customer choice, lower prices, better service, and greater innovation of services.

Unfortunately, the virtual collocation tariff filed by USWC does not follow these principles. In particular, the virtual collocation tariff filed by USWC limits the ability of an interconnector to control and estimate its costs. Furthermore, USWC's virtual collocation tariff may prevent an interconnector from providing a high level of service to its end users, to the extent that the interconnector relies on virtual collocation. In conclusion, under USWC's virtual collocation tariff the interconnector (and its customers) will still be at the mercy of USWC.

Issue A: Are the direct cost components of the LECs' virtual collocation rates justified?

1. <u>Charges for Provision of Interconnector-Designated Equipment</u>

By its recent tariff change allowing interconnectors to purchase their equipment and provide it to USWC on a "no-cost leaseback" basis, USWC has provided a reasonable approach which should allow interconnectors to control the costs of their interconnector-designated equipment.

2. Charges for Installation of Interconnector-Designated Equipment

USWC defended its charges for installation of IDE by focusing on the applicable rates and how those rates were determined. For example, USWC recovers the costs associated with installation of IDE through the VEIC Equipment and VEIC Engineering charges.[1] These are direct labor rates, based on the work groups that are involved with performing installation and engineering work activities associated with the IDE. In contrast, USWC recovers the cost of equipment installation and engineering for DS1 and DS3 services by developing a total installed investment to which annual cost factors (ACFs) are applied. The installation and engineering factors are a part of the investment loadings that are applied to the material investment to derive the total installed investment. Hence, USWC spreads the installation costs of DS1/DS3 services over recurring rates, but recovers all installation costs for the installation of IDE through nonrecurring charges. ELI is not necessarily opposed to USWC recovering installation charges

[1]VEIC refers to Virtual Expanded Interconnection/Collocation. VEIC Equipment Labor is a charge associated with the installation, change or removal (i.e., discontinuance) of VEIC equipment. The VEIC Equipment Labor charge is a nonrecurring charge based on the quote per one half hour (½) or fraction thereof. VEIC Engineering Labor is a charge associated with the planning and engineering of the VEIC equipment at the time of installation, change or removal (i.e., discontinuance). The VEIC Engineering Labor charge is a nonrecurring charge based on the quote per one half hour (½) of fraction thereof.

for virtual collocation services through nonrecurring charges, however, ELI does believe that recovery of costs should be done in a nondiscriminatory manner. Thus, recovery of costs (recurring and nonrecurring) for comparable services should be consistent. In addition to the cost recovery methodology, ELI has a number of specific concerns with respect to the actual charges for installation of IDE.

First, because USWC is unwilling to allow outside contractors to install ELI's transmission equipment, ELI has no control over the cost of installation. USWC will either use its own technicians, at a loaded hourly rate, or choose an outside contractor through a competitive bid process. However, the interconnector has no say in the matter, even if installation requires additional training costs. Because the interconnector has no control over the cost of installation of IDE, USWC is able to control a significant level of its competitors' costs. In addition, USWC has no incentive to minimize the cost of installing IDE since these costs are simply passed on to the interconnector. In fact, as the dominant provider of access services in its service territory, the economic incentive is for USWC to impose as much cost as possible on the interconnector. By denying interconnectors the right to choose an authorized third party provider of installation, maintenance, and repair services, USWC has put into place a tariff that allows it to drive up the costs to its competitors and retard the development of effective competition.

Second, ELI has no way of determining the cost of installation prior to USWC completing the work. This is because the interconnector has no way of determining whether training of USWC personnel will be necessary to install the IDE prior to submitting the Quote

Preparation Fee ($1,684.80).[2] If training is required then the interconnector incurs additional cost to train the USWC personnel. In addition, ELI has no way to discern the amount of time USWC will take to perform the installation of IDE. Thus, ELI is unable to calculate the total installed costs until after the fact. In comparison, GTE has tariffed a nonrecurring charge for each particular type of IDE which provides the interconnector a reasonable estimate of the cost to install a base module.[3] In ELI's opinion, the inability of the interconnector to estimate the total provisioning costs of virtual interconnection services substantially increases the risk associated with the service and will act to deter an interconnector from availing itself of the service.

Third, ELI is concerned about the level of service quality associated with the installation of its IDE. ELI is concerned about both the timing and quality of service with respect to the installation, maintenance, and repair of IDE. It is no secret that USWC is experiencing substantial quality of service problems throughout its service territory. If interconnectors are prevented from choosing among certified outside contractors, interconnectors may be subjected to lower quality of service levels than they and their customers are accustomed to, and demand.

Fourth, USWC's reluctance to allow interconnectors to choose a certified third party contractor completely ignores the Commission's policy in the Virtual Collocation Order. In that

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[2]The Quotation Preparation Fee (QPF) rate element is the fee for the work activities performed by USWC to develop a quotation.

[3]Direct Case of GTE, CC Docket No. 94-97, Phase II, October 19, 1995, pg 4.

order, the Commission concluded:

> We therefore conclude that LECs that permit outside service representatives to enter their central offices to install, maintain, or repair LEC equipment must permit outside representatives to provide these services for the equipment dedicated to interconnectors' use under virtual collocation. If LECs can choose from a range of levels of service quality offered by outside service representatives (e.g., repair times), the LECs must offer the same range of service options to virtual collocation customers in their tariffs.[4]

Finally, USWC's virtual collocation tariff is counter to the way transmission equipment is typically installed. The usual and customary manner to install advanced Fiber Optic Terminals and Next Generation Digital Loop Carrier equipment (which will be used to provide exchange telecommunications when connected at the main distribution frame to unbundled loops) is for the interconnector to issue a purchase order to the manufacturer for preassembled systems mounted in a special relay rack. This purchase order generally includes a fixed price contract for required factory engineering and installation. This installation job which will be billed to the interconnector includes the relay rack, all equipment including plug-ins and the necessary cabling to the battery distribution bay, the digital cross-connect frame (DSX) the main distribution frame (for connection to unbundled loops), and the fiber optic cables to connect to the fiber optic distribution unit. The installation contractor develops the fixed price bid by making a physical inspection of the facility with the telephone company engineer responsible for

[4]Virtual Collocation Order, In the Matter of Expanded Interconnection with Local Telephone Company Facilities, CC Docket No. 91-141, Memorandum Opinion and Order, 9 FCC Rcd at 5173, ¶ 59.

that site. Additionally, this fixed price installation work includes the system lineup and testing effort which requires the contractor to perform work at the LEC's central office and at the interconnector's central office. Pursuant to USWC's proposal, however, all of these functions are required to be performed by USWC personnel, regardless of whether a certified vendor could perform these functions at a better price and service quality level.

3. Charges for Maintenance and Repair of Interconnector-Designated Equipment

As stated above, the main issue is not how USWC is recovering the cost of maintenance and repair of IDE, but why it does not allow outside contractors to maintain and repair equipment dedicated to the use of the interconnectors. Only USWC and Bell Atlantic will not permit outside contractors to maintain and repair interconnector-designated equipment. By not allowing outside contractors, interconnectors are captive customers to the LEC for maintenance and repair of IDE. Conversely, if outside contractors were allowed, interconnectors would have a range of options with respect to price and service quality for the maintenance and repair of IDE. ELI will elaborate on the use of outside contractors for the installation, maintenance, and repair of IDE in a later section.

4. Charges for Cable Installation and Cable Support

No comment.

5. Charges for Cross-Connection Services

USWC stated it was not required to provide any information with respect to the charges for cross-connection services. However, the information requested by the Common Carrier Bureau (Bureau) pertains to the inclusion of repeaters or other equipment associated with cross-connection service. In addition, the Bureau directed that Southwestern Bell Telephone Company (SWB) must address why such equipment is necessary for the provision of cross-connection service. Even though USWC was not specifically required to provide cross-connect charge information, it does include repeaters in the cost of its cross-connection services. USWC's cross-connection services (i.e., the EICT), include equipment consisting of fiber distribution panels, regenerators, jumpers, digital cross-connects and other equipment as required to connect its facilities to the interconnectors. Therefore, USWC should be required to respond to the Bureaus request for information. Specifically, USWC should be required to respond to the following information requirement:

1. The investment in repeaters and other equipment associated with cross-connection service;

2. The cost of this equipment and why it is necessary for the provision of cross-connection service;

3. Whether it included investment for repeaters in any other virtual collocation rate elements.

4. Whether investment for repeaters is included in rates for the comparable DS1 and DS3 services; and

5. Whether investment for repeaters is included in rates for the Central Office Connecting Channel.

More importantly, however, USWC should defend why an interconnector cannot provision, through an outside contractor, the cabling necessary to provide the cross-connection function when its IDE is installed. For example, suppose an interconnector were able to install its IDE through a certified outside contractor. As is customary industry practice, at the time of installation of the IDE the contractor would provide USWC with all cables necessary to provide the cross-connect function, and all power cabling requirements. For cross-connect services, all USWC would need to do is connect the cable to the appropriate main distribution frame or digital cross-connect. No additional investment in cabling and repeaters by USWC is necessary.

Furthermore, USWC's tariff states that an interconnector must provide all necessary connecting cables, plug-ins and/or circuit packs when requesting VEIC Service.[5] All necessary connecting cables should include the cross-connect cables necessary to perform the cross-connect function, and the power cable necessary for connection to the closest power source that serves the IDE.

USWC's cross-connect charges, the EICT, are detrimental to competition. For example, compare two services which provide the same functionality: (1) the Central Office Connecting Channel (COCC); and (2) the Expanded Interconnection Channel Termination (EICT). Both services provide for connections within the same central office between two separate services (i.e., between two DS1services). The only difference is that under the Central Office Connection

[5]U S WEST Tariff F.C.C. No. 5, Section 21.5.4.B.4., Effective June 2, 1995.

Channel rate element the connection is between two USWC fiber optic terminals within the same central office. In comparison, the EICT rate element provides for the connection between the interconnector's fiber optic terminal and USWC's fiber optic terminal. Same functionality, same service. However, USWC is charging the following rates:[6]

	Nonrecurring	Recurring
Central Office Connecting Channel (DS1)	$30.00	$10.00
Central Office Connecting Channel (DS3)	$12.50	$10.00
Expanded Interconnection Channel Termination (DS1)	$313.25	$17.22
Expanded Interconnection Channel Termination (DS3)	$329.00	$52.50

It appears that USWC has strategically priced its EICT to discourage competition. Certainly, the significantly higher recurring and nonrecurring EICT charges compared to the COCC charges cannot be explained by USWC's argument that it must recover costs up front from its competitors while for end user services costs can be recovered throughout the life of the service. For this functionality, both the recurring and nonrecurring rates are signficantly higher for the competitor than the end user. At a minimum, USWC should be able to charge no more for an Expanded Interconnection Channel Termination than it does for a Central Office Connecting Channel. However, as ELI stated above, USWC should also have to justify why an interconnector cannot provision the cross-connect service when its IDE is initially installed.

[6]The rates for the Central Office Connecting Channel, DS1 and DS3 are in U S WEST's F.C.C. Tariff No. 5, Section 7.5.9.B. and 7.5.10.D., respectively. The rates for the Expanded Interconnection Channel Termination, DS1 and DS3 are in U S WEST's F.C.C. Tariff No. 5, Section 21.8.4.A.

6. Provisioning Charges

Pursuant to the Investigation Order, USWC was required to: (1) compare its virtual collocation provisioning charges with any provisioning charges imposed on customers of comparable DS1 and DS3 services; (2) justify the additional charges assessed for virtual collocation services if the virtual collocation provisioning charges exceed those imposed on customers of comparable DS1 and DS3 services; and (3) specify whether USWC recovers provisioning costs associated with comparable DS1 and DS3 services through overhead loadings or through direct assignment to particular rate elements.[7]

In response, USWC stated that the provisioning rates charged for DS1 and DS3 services are either the same or lower than the rates for virtual collocation service; and are recovered, in part, through recurring charges.[8] According to USWC, the difference is the result of its ability to recover provisioning charges for DS1 and DS3 services through its recurring rates. However, USWC provided no comparison of the actual provisioning costs of virtual collocation services to DS1 and DS3 services. In part, this ommission may result from an inherent deficiency in

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[7]Investigation Order, In the Matter of Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection Through Virtual Collocation for Special Access and Switched Transport, CC Docket No. 94-97, Phase II, Order Designating Issues for Investigation, at 21, ¶ 42.

[8]Direct Case of U S WEST Communications, Inc., CC Docket No. 94-97, Phase II, October 19, 1995, pg. 16.

USWC's approach to tariffing virtual collocation services: the inability to estimate the total charges for virtual collocation services.

7. Charges for Power to Interconnector-Designated Equipment

As stated above, ELI believes it is the usual and customary practice for the contractor who installs the transmission equipment in a telecommunications facility to include the power cables from the equipment to the closest power source that serves the IDE. This charge typically would be billed as part of the installation and equipment costs. Pursuant to USWC's proposal, however, the power cable would have to be bought from USWC.

In addition to the nonrecurring charges for a power cable, USWC applies a standard maintenance factor to the sum of the investment in the power cable to derive a monthly recurring rate. In ELI's opinion, applying a standard maintenance factor to a power cable illustrates how USWC is imposing needless costs on the interconnectors. Does USWC actually believe that a power cable requires significant monthly maintenance?

8. Charges for Floor Space

No comment.

9. Cost of Money Factors

No comment.

10. Completion of Direct Cost Information Charts

No comment.

Issue B: Are the rate structures established in the virtual collocation tariffs justified?

1. Nonrecurring Charges for Interconnector-Designated Equipment

No comment.

2. Charges for Training

As stated above, ELI believes that an interconnector should be able to estimate and control its costs, to the greatest extent possible, when purchasing virtual collocation services. With respect to the charges for training, the ability of an interconnector to control and estimate its costs requires resolution of two issues in USWC's VEIC tariff. First, USWC should be required to inform the interconnector of whether training costs for USWC personnel will be incurred prior to the interconnector submitting the Quotation Preparation Fee to USWC. Second, USWC should be required to allow interconnectors to choose from a list of certified outside contractors for the installation, maintenance, and repair of IDE.

The combination of these two requirements would permit the interconnector to make a better informed decision as to what transmission equipment it should deploy. Informing the interconnector of the types of equipment for which USWC personnel will not require any additional training, will help inform the interconnector when network planning and when making a purchasing decision. It will also aid the interconnector in choosing who will install, maintain, and repair such equipment, assuming such an option is created.

In its Direct Case, USWC stated that interconnectors can obtain a list of USWC approved and certified contractors. However, the inclusion on the list does not mean that any given contractor will be chosen.[9] As it stands, only USWC determines who will install, maintain, and repair the IDE. In addition, USWC stated in its Direct Case that it provides an "approved product" list with respect to transmission equipment. However, it does not have a specific tariff provision "describing types of equipment in our own network."[10] ELI believes that USWC should be able to provide a list of standard transmission equipment for which training will not be required prior to a submittal of the Quotation Preparation Fee by the interconnector. This way, the interconnector will be able to determine whether training costs should be factored into its purchasing decision for certain transmission equipment. For example, GTE states in its Direct Case:

> GTE will provide a list of standard equipment for a specific end

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[9] Direct Case of U S WEST Communications, Inc., at 34.

[10] Direct Case of U S WEST Communications, Inc., at 29.

> office if requested by an interconnector. GTE has responded quickly to such requests and has found that this approach is reasonable and has worked well.[11]

At a minimum, USWC should be required to provide similar information prior to an interconnector submitting its Quotation Preparation Fee. USWC's argument that divulging such information would skew purchasing behavior of interconnectors in a manner that might depress vigorous competition in the termination equipment manufacturing market is without merit.

3. Clarification of Training Provisions

ELI believes that if USWC is required to publish a list of transmission equipment that will not require training expense to be incurred, and allow interconnectors to choose from a list of certified contractors that ELI's concern over the training provision will be mitigated. If USWC is opposed to publishing a list of transmission equipment, at a minimum it should be required to inform the interconnector prior to the interconnector submitting a QPF of whether USWC will need to train its personnel.

4. USWC's and Ameritech's Rate Structures for Cabling

No comment.

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[11] Direct Case of GTE, at 17.

Issue C: Are the terms and conditions in the virtual collocation tariffs reasonable?

1. SWB's Obligation to Accept Interconnector-Designated Equipment

No comment.

2. Use of Outside Contractors for Installation, Maintenance and Repair of Interconnector-Designated Equipment

In the Virtual Collocation Order the Commission concluded:

> Virtual collocation customers should not be required to pay for costly training of LEC employees if the LEC uses qualified outside contractors to install, maintain, and repair other equipment in its offices. We therefore conclude that LECs that permit outside service representatives to enter their central offices to install, maintain, or repair LEC equipment must permit outside representatives to provide these services for the equipment dedicated to interconnectors' use under virtual collocation. If LECs can choose from a range of levels of service quality offered by outside service representatives (e.g., repair times), the LECs must offer the same range of service options to virtual collocation customers in their tariffs.[12]

The Commission based its conclusion on the fact that use of outside contractors can reduce LEC costs, reduce or eliminate a LEC's need to train employees, allow interconnectors to avoid the substantial costs that might be incurred to train LEC personnel, and provide a range of level of service quality (e.g., repair times). ELI concurs with the Commission's opinion.

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[12] Virtual Collocation Order, 9 FCC Rcd at 5173, ¶ 59.

Furthermore, ELI strongly believes that allowing interconnectors to use outside contractors provides interconnectors greater control over both the costs of virtual interconnection and the level of service quality.

In its Direct Case, USWC readily admitted that, on occasion, it uses certified outside contractors for installation of central office equipment (including termination equipment). According to USWC, outside contractors are used when USWC's installation schedule cannot accommodate a particular project's timefames and/or when its work force does not currently have the background for the required installation.[13] However, USWC continues to deny interconnectors the same range of options with respect to price and level of service quality. USWC stated in its Direct Case:

> we will not permit [ICs] to choose from a list of certified contractors available to install, maintain, or repair the [IDE]...because we do not have such an approach to outside contractor assistance. Such assistance is totally based on any specific U S WEST need for assistance at any specific point in time.[14]

In ELI's opinion, USWC does not have an approach only because it does not want to allow interconnectors the same ability as USWC has with respect to choosing an outside contractor for installation, maintenance, and repair of IDE, contrary to the Commission's policy. Furthermore, USWC does have a process for choosing outside contractors when it requires them.

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[13]Direct Case of U S WEST Communications, Inc., at 33.

[14]Id., at 33, footnote 106.

According to USWC's Direct Case, outside contractors are chosen from the USWC list of approved contractors. Each specific job (or need) is handled by means of a specific bid request. Those bids are then awarded on a competitive bid basis.[15] ELI presumes that USWC does this in order to minimize its costs and control work load. However, USWC is denying interconnectors the same ability by requiring them to use USWC's personnel, even though additional training of those personnel may be required or an outside contractor could provide the service at a lower cost or higher level of service.

In addition to the inability of an interconnector to estimate and control its virtual interconnection costs under USWC's virtual collocation tariff, ELI has serious concerns with respect to the level of service quality. It is no secret that USWC is experiencing substantial criticism over its level of service quality. The quality of service concern is not limited to local exchange end users, but in fact permeates throughout USWC's services. In recent cases before the Oregon Public Utility Commission (OPEC) and the Washington Utilities and Transportation Commission (WUTC), evidence has been presented that prove that USWC is experiencing quality of service problems with both special and switched access customers as well.[16] There is no reason that an interconnector (and its customers) should be subjected to USWC's quality of

[15]Id., at 33.

[16]ELI has only mentioned the public utility commissions in Oregon and Washington because it has filed direct testimony in one (Washington) and cross-examined USWC's witnesses in the other (Oregon) with respect to quality of service problems. However, it is evident that USWC is experiencing quality of service problems throughout its fourteen state region.

service problems if in fact there is an alternative, such as using a certified outside contractor to install, maintain, and repair the IDE.

As stated above, ELI also believes that USWC continues to ignore the Commission's policy in the Virtual Collocation Order because, unlike most other LECs, USWC does not allow an interconnector to choose from a list of certified contractors available to install, maintain, or repair the IDE even though USWC occasionally uses outside contractors.

3. Installation, Maintenance and Repair Intervals

As stated above, ELI believes that USWC is experiencing significant service quality problems. Therefore, USWC should be required to allow certified outside contractors to perform installation, maintenance and repair of IDE. Otherwise, an interconnector's level of service quality will be dictated by USWC. Instead of the level of service quality increasing due to competition, it will be reduced to the lowest common level in existence today.

4. USWC's Insurance Requirement

No comment.

5. LECs' Liability

No comment.

6. Ordering and Billing Virtual Collocation Services

No comment.

CONCLUSION

In conclusion, USWC's virtual collocation tariff continues to impair competition in the interstate access market due to its numerous deficiencies. These deficiencies inherent in the virtual collocation tariff include USWC's control over interconnectors' costs, the inability of the interconnector to estimate its costs, and the inability of the interconnector to achieve a higher level of service quality. All of these problems must be rectified if the Commission's policy to increase competition in the interstate access market is to be achieved.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of November, 1995, an original and seven copies of the Comments on Direct Case of Electric Lightwave, Inc., CC Docket no. 94-97, Phase II, were served by first-class mail, postage prepaid, or by hand as indicated by asterisk, on all parties on the attached service list.

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